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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff,

vs.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
OPPOSITION TO SONOS, INC.'S  
MOTION FOR SUMMARY JUDGMENT  
REGARDING GOOGLE'S CONTRACT-  
RELATED CLAIMS**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of its Opposition to Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment Regarding Google’s Contract-Related Claims (“Opposition”). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

<b>Document</b>	<b>Portions to Be Filed Under Seal</b>	<b>Designating Party</b>
Opposition	Portions highlighted in yellow and green	Google
Exhibit 5	Entire document	Google
Exhibit 9	Entire document	Google
Exhibit 10	Entire document	Google
Exhibit 16	Entire document	Google
Exhibit 17	Entire document	Google
Exhibit 18	Entire document	Google
Exhibit 19	Entire document	Google
Exhibit 21	Entire document	Google
Exhibit 33	Entire document	Google
Exhibit 35	Entire document	Google

Exhibit 36	Entire document	Google
Exhibit 37	Entire document	Google
Exhibit 38	Entire document	Google
Exhibit 40	Entire document	Google
Exhibit 41	Entire document	Google

4. The portions of Google's Opposition highlighted in green and yellow as well as Exhibits 5, 9, 10, 16, 17, 18, 19, 21, 33, 35, 36, 37, 38, 40, and 41 contain confidential business agreements and licensing negotiations that are not public. I understand that public disclosure of this information would harm Google's competitive standing and its ability to negotiate future agreements by giving competitors access to Google's highly confidential business thinking and asymmetrical information about Google's collaboration strategies to other entities. If such information were made public, I understand that Google's competitive standing would be significantly harmed. Google has therefore designated this information as **HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY** under the protective order (Dkt. No. 92). A less restrictive alternative than sealing would not be sufficient because the information sought to be sealed is Google's proprietary and confidential business information but has been utilized by Google in support of its Opposition. I also understand that this Court has previously granted sealing of the same and/or similar information. *See, e.g.*, Dkt. 39.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on February 21, 2023, in San Francisco, California.

1 DATED: February 21, 2023

2 By: /s/ Jocelyn Ma

3 Jocelyn Ma

**ATTESTATION**

I, James Judah, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: February 21, 2023

/s/ James Judah

James Judah